



SAN DIEGO NATURAL HISTORY MUSEUM
BALBOA PARK - SAN DIEGO SOCIETY OF NATURAL HISTORY - ESTABLISHED 1874

9 October 2015

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: Paleontological Resources and Proposed Updates to the CEQA Guidelines – August 11, 2015

Dear Mr. Calfee:

I appreciate the opportunity to comment on the Proposed Updates to the CEQA Guidelines document dated August 11, 2015 and commend the Office of Planning and Research for their efforts on behalf of California's unique environment. My area of concern with the current document involves proposed changes to Appendix G, specifically how potential adverse impacts to paleontological resources are addressed. Having followed the issues surrounding passage of AB52, I am well aware of the requirements to separate consideration of paleontological resources from consideration of cultural resources. However, moving consideration of paleontological resources and consideration of geologic features from the Cultural Resources Issue and placing them together under the expanded Open Space, Managed Resources and Working Landscapes Issue fails to recognize the true significance of paleontological resources and their educational and scientific value to the citizens of California. Consolidating paleontological resources with geologic features, wildlife habitat, and waters of the state does not seem logical given the buried nature of paleontological resources (i.e., fossils), their occurrence in stratified sedimentary rocks, and the fact that fossils serve as direct evidence of ancient biodiversity and the ecosystems that supported that biodiversity.

To my mind, the proposed changes to Appendix G regarding paleontological resources run the risk of drastically reducing the attention given to these important educational and scientific resources by lead agencies when reviewing project proposals and environmental documents. Rather than reducing the attention these resources are given, I would hope that the State of California would be more interested in increasing that attention. To underscore the significance of the educational and scientific value of paleontological resources as distinct from non-biological natural resources like geologic features and waterways, it is instructive to note that in 2009 the federal government passed the Paleontological Resources Protection Act. This legislation and its accompanying implementation guidelines has gone a long way in elevating the review of potential impacts to paleontological resources on lands managed by the Bureau of Land Management and U.S. Forest Service.

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Based on the above discussion I would like to recommend an alternative solution to the requirements of AB52 from the one offered in the proposed document. My suggestion is to establish a new Issue in Appendix G for consideration of paleontological resources. An example checklist question for this new Issue might read as follows:

Issue VI. PALEONTOLOGICAL RESOURCES -- Would the project:

a) Cause an adverse change to a significant or unique paleontological resource.

Establishment of a standalone Issue for paleontological resources will have the positive effect of satisfying the requirements of AB52, while recognizing the unique educational and scientific value of such resources.

Thank you again for the opportunity to review and comment on the proposed revisions to the California Environmental Quality Act.

Sincerely,

A handwritten signature in black ink that reads "Thomas A. Deméré". The signature is written in a cursive style with a long horizontal line extending from the start of the name.

Thomas A. Deméré, Ph.D.
Curator, Department of Paleontology
Director, Department of PaleoServices